

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT DEDMON,

Plaintiff,

v.

SHELL EXPLORATION & PRODUCTION
COMPANY AND SHELL TRADING
SERVICES COMPANY,

Defendants

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CIVIL ACTION NO.

4:21-CV-03371

**DEFENDANTS' OBJECTIONS TO
PLAINTIFF'S WITNESS LIST**

Defendants Shell Exploration & Production Company and Shell Trading Services Company ("Defendants" or "Shell"), in response to Plaintiff's Witness List (Dkt. No. 58), state the following:

"Family and Friends" Witnesses, including Adigun, Crutchfield, Callis, K. Dedmon, R. Dedmon, Jr., McKinnon (Brown), Porter, Saunders: Defendants object to these "family and friend" witnesses because their testimony is irrelevant, unnecessarily duplicative of other proposed witness testimony, unfairly prejudicial and lacking in probative value, expected to contain hearsay, and cumulative. FRE 401-403; 801-803.

Gentill Abdulla: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

James Ledbetter: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403;

801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Tim Hood: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Luis Lugo: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Jasmine Turner: Defendants object to this witness because all or part of her testimony is irrelevant, unfairly prejudicial, lacks probative value, is expected to contain hearsay, includes unsupported and/or impermissible assertions (including regarding causation), is beyond the scope of Plaintiff's designation of this witness. FRE 104; 401-403; 702; 801-803; *Edmonds v. Illinois Cent. Gulf R. Co.*, 910 F.2d 1284, 1286-88 (5th Circ. 1990); *see Shu-Hui Wu v. Mississippi State Univ.*, 626 Fed. Appx. 535, 540 (5th Cir. 2015); *see also Viterbo v. Dow Chem. Co.*, 826 F.2d 420, 424 (5th Cir. 1987); *Chavez v. Home Depot*, 2023 WL 6119881, **2-5 (S.D. Tex., Sept. 18, 2023).

Sean Matthews: Defendants object to this witness because his testimony is irrelevant, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Raif Rucker: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-

803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Meredith Lilly: Defendants object to this witness because her testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

D’Andra Wallace: Defendants object to this witness because her testimony is irrelevant, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Glenn Wright: Defendants object to this witness because his testimony is irrelevant, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803.

Priscilla Partida: Defendants object to this witness because her testimony is irrelevant, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Guardie Banister: Defendants object to this witness because his testimony is irrelevant and unfairly prejudicial, lacks probative value, and is expected to contain hearsay. FRE 401-403; 801-803; *see Mooney v. Aramco Services Co.*, 54 F.3d 1207, 1220-21 (5th Cir. 1995); *see also Harpring v. Continental Oil Co.*, 628 F.2d 406, 410 (5th Cir.1980).

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025 a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will provide notification of this filing to all known attorneys of record.

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